

# COLUCCI & GALLAHER, P.C.

Direct Dial: (716) 854-4073  
rlg@cgbuffalo.com

May 25, 2023

## Via CM/ECF

Honorable Elizabeth A. Wolford  
United States District Judge  
Kenneth B. Keating Federal Building  
100 State Street  
Rochester, New York 14614

Re: In re Caustic Soda Antitrust Litigation  
Lead Case No. 1:19-cv-00385-EAW-MJR

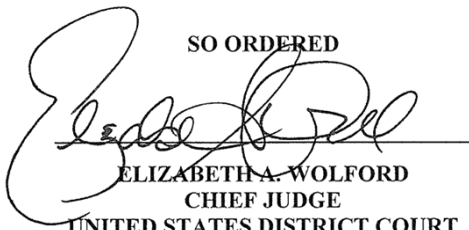
Dear Judge Wolford:

As the Court knows, the undersigned serves as liaison counsel for the Indirect Purchaser Plaintiffs ("IPPs") in connection with the above-referenced matter. I write regarding the Court's Text Order (ECF No. 619) granting the parties' recent Motions to Seal and requiring the parties to make the filings directed in the Court's Decision and Order entered on April 25, 2023 (the "Court's Order," Dkt. 603) within one week, making the current deadline Tuesday, May 30, 2023.

The Parties have met, conferred, and coordinated the procedure by which they will input the required redactions and sealing in their papers. Given the upcoming holiday weekend, the lengthy and numerous papers and exhibits to be sealed, and the fact that IPPs must redact materials described in roughly a dozen affidavits or declarations in order to protect the confidential information of Defendants and non-parties, IPPs request three (3) extra days to make the filings directed in the Court's Order. This would move the associated deadline to Friday, June 2, 2023.

Defendants and Direct Purchaser Plaintiffs do not object to this Request.

The Parties appreciate the Court's consideration of this request.

SO ORDERED  
  
ELIZABETH A. WOLFORD  
CHIEF JUDGE  
UNITED STATES DISTRICT COURT  
Dated: May 26, 2023

Respectfully,  
  
Ryan L. Gellman  
for COLUCCI & GALLAHER, P.C.

RLG/lmw